

Gary F. Wang (SBN 195,656)
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Jeannine V. Stepanian (SBN 313,291)
jstepanian@gfwanglaw.com
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448 South Pasadena Avenue
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Telephone: (626) 585-8001
Facsimile: (626) 585-8002

Attorneys for Fox Luggage, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

SINCERE ORIENT COMMERCIAL
CORPORATION, a California
corporation,

CASE No.: 2:17-CV-04755-PSG-RAO

Plaintiff,

V.

CITY OF INDUSTRY, SUCCESSOR
AGENCY TO THE INDUSTRY
URBAN-DEVELOPMENT
AGENCY, California unit of local
government; FOX LUGGAGE, INC. a
California corporation; and DOES 1
through 50, inclusive,

**DECLARATION OF GARY WANG
IN SUPPORT OF DEFENDANT
FOX LUGGAGE, INC.'S MOTION
TO SET ASIDE ENTRY OF
DEFAULT**

Defendants.

DECLARATION OF GARY WANG

I, GARY WANG, declare:

1. I am an attorney at law licensed to practice before all of the Courts of this state and I am a member of the bar of this Court. I am the attorney responsible for representing Defendant Fox Luggage, Inc. (“Fox Luggage”) in this litigation. I make this declaration in support of Fox Luggage’s Motion to Set Aside Entry of Default. The facts stated in this declaration are within my personal knowledge, except as where stated on information and belief and, as to those facts, I believe them to be true, and if called as a witness I could and would testify as follows.

2. I contacted Plaintiff's counsel Alexander Chen via electronic mail on November 7, 2017 in an attempt to meet and confer for the purpose of filing a motion to set aside the default entered against Fox Luggage. Mr. Chen and his co-counsel William Walz replied the following two days regarding the same.

3. On November 9, 2017, Mr. Walz informed me via electronic mail that the total cost of taking the default was \$415.

4. On November 13, 2017, I informed Mr. Walz and Mr. Chen, via electronic mail, that Fox Luggage agreed to pay the cost of taking the default, and that I would prepare the joint motion to set aside default and declaration in support thereof.

5. On November 14, 2017, I provided Mr. Walz and Mr. Chen with a copy of the Declaration of Wayne Wang in Support of Joint Motion to Set Aside Default via electronic mail.

6. On November 20, 2017, I called Mr. Walz to discuss the joint motion and declaration. Receiving no answer, I left Mr. Walz a voicemail message.

7. Thereafter and also on November 20, 2017, I emailed Mr. Walz informing him that I had attempted to reach him by phone and had left him a voicemail message. Mr. Chen was copied on this message.

8. On November 21, 2017, I called Mr. Walz at his mobile number, and left another voicemail message.

9. Thereafter and also on November 2017, I also emailed Mr. Walz to inform him of the two phone calls and the two voicemails. I repeated my request that he contact me to discuss the motion to set aside default.

10. I have not received an electronic message, phone call, or any other correspondence from Plaintiff's counsel since November 9, 2017. Despite repeated attempts via multiple channels of communication to contact Plaintiff's counsel to meet and confer regarding the motion to set aside default, I have been unable to reach Plaintiff's counsel.

11. Despite having made numerous good-faith attempts to meet and confer with Plaintiff's counsel per Local Rule 7-3 I have been unable to meet and confer with Plaintiff's counsel regarding this motion.

12. Due to a lack of response from Plaintiff's counsel I must file the Motion to Set Aside Entry of Default, filed herewith, without prior conference of counsel at least ten days prior to the filing of the motion per Local Rule 7-3.

13. True and correct copies of all of the above-mentioned electronic mails are attached hereto as Exhibit A.

I declare under penalty of perjury in accordance with the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on November 22, 2017 at Pasadena, California.

Gary Wang

8. On November 21, 2017, I called Mr. Walz at his mobile number, and left another voicemail message.

9. Thereafter and also on November 2017, I also emailed Mr. Walz to inform him of the two phone calls and the two voicemails. I repeated my request that he contact me to discuss the motion to set aside default.

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Gary Wang

Exhibit A



**Sincere Orient Commercial Corporation v. City of Industry, et al., Case No.:
2:17-cv-04755-PSG-RAO**

10 messages

Gary Wang <garywang@gfwanglaw.com>
To: alexc@inhouseco.com, ww@inhouseco.com, tlee@inhouseco.com
Cc: Jeannine Stepanian <jstepanian@gfwanglaw.com>

Mon, Nov 6, 2017 at 2:07 PM

Dear Mr. Chen:

Our firm has just been retained by Fox Luggage, Inc. to represent Defendant Fox Luggage, Inc. in the above-captioned case. Our client just got the complaint and the request for entry of default from its CPA. I called you twice today and left messages asking for a stipulation for extension of time to file a response to the complaint. I have not yet received your response.

I understand that you have filed a request for entry of default with the Court. But I believe that it will save both your and our time as well as the Court's time to stipulate an extension of time to file a response to the complaint, rather than fight for the request for entry of default in Court.

Please let me know if you agree to the extension of time for two weeks to file a response. Thank you in advance for your anticipated cooperation.

Gary Wang

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Gary Wang <garywang@gfwanglaw.com>

To: alexc@inhouseco.com, ww@inhouseco.com, tlee@inhouseco.com

Cc: Jeannine Stepanian <jstepanian@gfwanglaw.com>

Tue, Nov 7, 2017 at 5:06 PM

Mr. Chen:

We are informed that the Court clerk in the above-captioned case has entered a default against our client Fox Luggage, Inc. I would like to set a meet and confer conference for the purpose of filing a motion to set aside the default entered against Fox Luggage, Inc. I am hoping that you agree to file a joint motion to set aside the default. Please let me know when is your earliest convenience to have such a meet and confer conference. Thank you.

Gary Wang

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[Quoted text hidden]

Alexander Chen <alexc@inhouseco.com>

Wed, Nov 8, 2017 at 8:29 AM

To: Gary Wang <garywang@gfwanglaw.com>

Cc: ww@inhouseco.com, tlee@inhouseco.com, Jeannine Stepanian <jstepanian@gfwanglaw.com>

Thank you Gary for your email.

I am out of office this week. My co counsel William will revert back to you today.

Best regards,

Sent from my iPhone

[Quoted text hidden]

William Walz <ww@inhouseco.com>

Wed, Nov 8, 2017 at 10:34 AM

To: Gary Wang <garywang@gfwanglaw.com>

Cc: Alexander Chen <alexc@inhouseco.com>, Theodore Lee <tlee@inhouseco.com>, Jeannine Stepanian <jstepanian@gfwanglaw.com>

Hello Mr. Wang,

I am co-counsel with Mr. Alexander Chen in this matter. We are of course respectful of the Court's time and mindful of the legal costs to the parties. It is yet unclear why your client chose to ignore service of the complaint filed against it. Mr. Chen relayed information from you that it had something to do with your client's CPA/agent for service of process dropping the ball and not taking the required action. In any event, as a professional courtesy to you, we will advise our client, who has already obviously been put to great expense and severely prejudiced by the action we complain of in this lawsuit, to cooperate in your request, if you would be so kind as to have the CPA/agent for service prepare and execute a Declaration explaining clearly, the reason for the failure to timely respond to the Service of Process, and reimburse our client the actual cost for having to take the default and now participate in the motion you are seeking.

Of course, if this is not acceptable, we will fully honor our obligations to meet and confer with you.

I can be reached by telephone 949-887-5897 today after 3:30 PM, or by email.

Thank you in advance for your courtesy and cooperation.

Sincerely,

William Walz

[Quoted text hidden]

--

William R. Walz, Esq.

Inhouse Co Law Firm

Irvine Office: Yard House Restaurant Bldg.

7700 Irvine Center Dr. Suite 800

Irvine, CA 92618

V 949-250-1555

F 714-882-7770

C 949-887-5897

Inhouse Co Law Firm

San Jose Office: Almaden Financial Plaza

1 Almaden Blvd Suite 810

San Jose, Ca. 95113

V 408-918-5393

F 650-204-6802

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Case 2:17-cv-04755-PSG-RAO Document 19-3 Filed 11/22/17 Page 9 of 17 Page ID #:1215

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Cc: Alexander Chen <alexc@inhouseco.com>, Theodore Lee <tlee@inhouseco.com>, Jeannine Stepanian <jstepanian@gfwanglaw.com>

Mr. Walz:

Thank you for your email. I appreciate that you are willing to work with us in resolving the default issue.

We are going to prepare for a declaration under oath from Fox Luggage, Inc. to explain the reason for not filing a timely response to the complaint. Before asking our client for an agreement to pay for the cost of taking the default, would you please let me know how much the cost is? Thank you.

Gary

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[Quoted text hidden]

William Walz <ww@inhouseco.com>

Thu, Nov 9, 2017 at 3:55 PM

To: Gary Wang <garywang@gfwanglaw.com>

Cc: Alexander Chen <alexc@inhouseco.com>, Theodore Lee <tlee@inhouseco.com>, Jeannine Stepanian <jstepanian@gfwanglaw.com>

Mr. Wang,

Thank you for your response and proposal. The cost of taking the default was: 1 hour of attorney time at \$350/hour, and 1 hour of paralegal time at \$65/hour, for a total of \$415.00.

Best regards,

WW

[Quoted text hidden]

Gary Wang <garywang@gfwanglaw.com>

Mon, Nov 13, 2017 at 1:57 PM

To: William Walz <ww@inhouseco.com>

Cc: Alexander Chen <alexc@inhouseco.com>, Theodore Lee <tlee@inhouseco.com>, Jeannine Stepanian <jstepanian@gfwanglaw.com>

Mr. Walz:

Our client agrees to pay your client \$415 for the filing of the request for default. I am prepare for the declaration and will forward it to you later. We will prepare for a joint motion to set aside default. Please let me know if you have any question. Thank you.

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Gary Wang <garywang@gfwanglaw.com>

Tue, Nov 14, 2017 at 4:25 PM

To: William Walz <ww@inhouseco.com>

Cc: Alexander Chen <alexc@inhouseco.com>, Theodore Lee <tlee@inhouseco.com>, Jeannine Stepanian <jstepanian@gfwanglaw.com>

Mr. Walz:

Here is a copy of d draft declaration for your review. Thank you.

Gary

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Of course, if this is not acceptable, we will fully honor our obligations to meet and confer with you.

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William R. Walz, Esq.

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Irvine, CA 92618
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F 714-882-7770
C 949-887-5897

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William R. Walz, Esq.

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82K

Gary Wang <garywang@gfwanglaw.com>

Mon, Nov 20, 2017 at 2:21 PM

To: William Walz <ww@inhouseco.com>

Cc: Alexander Chen <alexc@inhouseco.com>, Theodore Lee <tlee@inhouseco.com>, Jeannine Stepanian <jstepanian@gfwanglaw.com>

Mr. Walz:

I just called and left a message in your voicemail. I would like to discuss this matter further with you. Please give me a call at your earliest convenience. If you cannot reach me in my office, please call my cell phone at (626) 215-4279. Thank you.

Gary

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Email: garywang@gfwanglaw.com

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<Declaration of Wayne Wang for Joint Motion rev.pdf>

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Gary Wang <garywang@gfwanglaw.com>

Tue, Nov 21, 2017 at 1:05 PM

To: William Walz <ww@inhouseco.com>

Cc: Alexander Chen <alexc@inhouseco.com>, Theodore Lee <tlee@inhouseco.com>, Jeannine Stepanian <jstepanian@gfwanglaw.com>

Mr. Walz:

I called you yesterday and left a message in your voicemail at your office. I just called you again and left a message in your cell phone. Please call me when you get a chance to discuss the motion to set aside default. Thank you.

Gary

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